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**RECEIVED**

July 12, 2002

JUL 12 2002

VIA: HAND DELIVERY AND FACSIMILE (202) 418-2825

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Eric Einhorn, Acting Chief  
Telecommunications Access Policy Division  
Wireline Competition Bureau  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

**Re: LETTER OF APPEAL**  
**Legal Reporting Name: Morris Communications, Inc.**  
**Filer 499 ID: 812163**

Dear Mr. Einhorn:

Morris Communications, Inc. ("Morris"), by its attorneys, and pursuant to the instructions contained in the letter attached as Exhibit One, hereby appeals the decision of the Universal Service Administrative Company ("USAC") dated May 15, 2002, which is attached as Exhibit One. In that decision, USAC notified Morris that it was unable to accept the revised FCC Form 499-A submitted by Morris on or about March 25, 2002, covering the time period January 1 – December 31, 1999, because the revision "was not filed within one year of the original submission." Morris respectfully submits that, for the reasons stated herein, the revised Form 499-A, a copy of which is attached as Exhibit Two, should be accepted by USAC and that USAC should promptly issue corrected invoices to reflect the proper universal service contribution amount owed by Morris.

**I. Background**

When Morris completed and filed its FCC Form 499 for the time period covering January 1 through December 31, 1999, it mistakenly reported its intrastate revenues as international revenues. Morris has no international revenues. This clerical error resulted in Morris being improperly billed over \$500,000 in universal service fees (based upon Morris's calculations, Morris should have been billed approximately \$55,000 to \$70,000).

One Atlantic Center  
1201 West Peachtree Street  
Atlanta, GA 30309-3424  
404-881-7000  
Fax: 404-881-7777

Bank of America Plaza  
101 South Tryon Street, Suite 4000  
Charlotte, NC 28280-4000  
704-444-1000  
Fax: 704-444-1111

90 Park Avenue  
New York, NY 10016  
212-210-9400  
Fax: 212-210-9444

3201 Beechleaf Court, Suite 600  
Raleigh, NC 27604-1062  
919-862-2200  
Fax: 919-862-2260

The management of Morris contacted USAC by telephone several times after receiving the erroneous invoice to explain the problem and to request an amended invoice. The errors were never corrected, so Morris's Controller contacted USAC by telephone in April and July 2001 to again request amended invoices. Morris's Controller was told that the billing error would be corrected; however, Morris's invoices were never corrected, and its invoices still show an improper outstanding balance of over \$475,000.

In March 2002, Morris's Controller spoke with Lori Terraciano of USAC about the invoice problems, and Ms. Terraciano provided guidance concerning the correction of previous erroneous filings and the manner in which Form 499 filings should be made in the future. Pursuant to Ms. Terraciano's instructions, Morris re-filed its Form 499 covering January – December 1999, on March 25, 2002. That corrective filing was rejected in USAC's letter dated May 15, 2002, since it was not filed within one year of the original submission (See Exhibit One).

## **II. USAC Does Not Have Authority To Assess Universal Service Payments Based Upon Intrastate Revenues.**

Morris submits that, because USAC's original calculation of more than \$500,000 in universal service fees owed by Morris was based upon Morris's intrastate revenue figures, it is a void assessment and cannot be sustained. As noted above – and as Morris has explained to USAC in several telephone discussions – Morris mistakenly reported its intrastate revenues as international revenues in its original Form 499 filing for 1999. Morris does not provide international services, and discovered its mistake in completing the Form 499 when it received its invoice from USAC assessing more than \$500,000 in universal service contribution fees.

Neither the FCC nor USAC has authority to assess universal service contributions based upon intrastate revenues. See Texas Office of Public Utility Counsel v. FCC, 183 F.3d 393, 448 (5<sup>th</sup> Cir. 1999), cert. denied, 530 U.S. 1210 (2000). See also In the Matter of Federal-State Joint Board on Universal Service; Access Charge Reform, Sixteenth Order On Reconsideration in CC Docket No. 96-45, Eighth Report And Order in CC Docket 96-45, Sixth Report And Order in CC Docket 96-262, 15 FCC Rcd 1679, para. 15 (1999) (stating, "Specifically, in response to the court's determination that the Commission lacks jurisdiction to assess providers' intrastate revenues, we have eliminated intrastate revenues from the [universal service] contribution base."). See also Sections 54.706 and 54.709 of the Commission's rules, 47 C.F.R. §§ 54.706, 54.709.

Because Morris's original universal service assessment was based upon figures that included intrastate revenues, that assessment is void as a matter of law. Therefore, Morris respectfully requests that USAC recalculate the valid amount of universal service fees owed by Morris based upon the revised Form 499-A attached as Exhibit Two (which was filed with USAC on or about March 25, 2002).

### **III. Morris's Inclusion Of Intrastate Revenues On Its Form 499 Was The Result Of a Clerical Error.**

When Morris completed and filed its original Form 499 filing for the time period covering January through December 1999, it mistakenly reported its intrastate revenue figures as international revenues. This mistake was purely a clerical error caused by confusion concerning the proper manner in which to complete the Form 499.

The FCC has on numerous occasions allowed applicants to amend applications that omitted information, or contained incorrect information due to clerical error, when the applicant made a substantial good faith effort to promptly correct the deficiency. See, e.g., Hispanic Information and Telecommunications Network, Inc., 60 RR 2d 828 (M. Med. Bur., 1986) (applicant was able to timely correct an error in an application by subsequently submitting a corrected document); William M. Ryan, 1 FCC Rcd. 1077 (Com Car. Bur., 1986) (a clerical error in a cellular application could be remedied by a post-lottery amendment); Butte Cellular Group, 60 FCC Rcd. 6745 (1991) (reinstatement of a cellular application containing missing documents due to clerical error was warranted).

Since receiving USAC's assessment based upon the original Form 499 filing, Morris has made many good-faith attempts to correct the problems with Morris's universal service invoices. The management of Morris and Morris's Controller have contacted USAC numerous times, attempting to resolve the problems with Morris's universal service invoices, and they were told in telephone discussions that the invoices would be corrected. It was not until March 2002 that Morris's Controller was advised by Ms. Terraciano of USAC that submission of a revised Form 499 for the January – December 1999 time period would be necessary to correct the invoices. Morris completed the revised Form 499 promptly after the discussion with Ms. Terraciano and submitted the revised Form 499 on March 25, 2002. Consistent with FCC precedents concerning obvious, clerical errors, Morris should be permitted to make appropriate corrections to its Form 499.<sup>1</sup>

### **IV. Conclusion**

In light of the fact that USAC's original universal service contribution assessment upon Morris for the January – December 1999 time period included intrastate revenue figures, and Morris's good-faith attempts over the past two years to correct the problems with its universal service invoices, Morris requests that it be permitted to correct the

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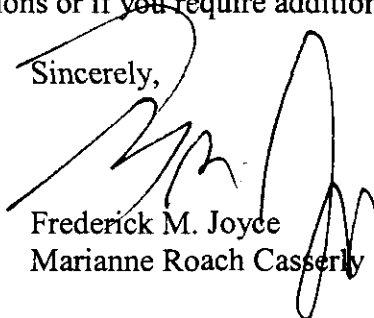
<sup>1</sup> Morris notes that, although USAC's letter of May 15, 2002, refers to a one-year deadline for making revisions to Form 499 filings, Morris cannot find any basis in the FCC's rules for imposing such a deadline, nor does USAC's letter cite any rule as the basis for the one-year deadline. Assuming (without conceding) that the one-year deadline is valid, it should not be enforced in this instance, or should be waived, because Morris's clerical error in completing the Form 499 led to a dramatic overassessment of amounts owed by Morris; therefore, there was clearly no intent on the part of Morris to report inaccurate revenues.

Universal Service Administrative Company (USAC)  
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clerical error included on its original Form 499 filing for the January – December 1999 time period without further delay. In this regard, Morris requests that USAC process the Form 499 filing made by Morris on or about March 25, 2002, and issue corrected invoices to Morris reflecting the proper universal service contribution amounts owed.

Thank you for your time and attention to this matter. Please contact the undersigned directly if you have any questions or if you require additional information.

Sincerely,



Frederick M. Joyce  
Marianne Roach Casserly

MRC:mrc  
Enclosures

cc: Universal Service Administrative Company (USAC), 2120 L Street, NW,  
Suite 600, Washington, DC 20037  
H. A. Morris, III, President and CEO, Morris Communications, Inc.  
W. Todd Hicks, Controller, Morris Communications, Inc.

WDC01/97747v1



## Universal Service Administrative Company

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May 15, 2002

Morris Communications, Inc.  
P.O. Box 16419  
Greenville, SC 29606

Filer 499 ID: 812163

Attn: Todd Hicks

RE: Form 499-A Revision Rejection

The Universal Service Administrative Company (USAC) has completed a review of the Revised FCC Form 499-A that you submitted for the purpose of revising revenue reported by Morris Communications, Inc. for the period January 1 – December 31, 1999. Based on the information provided, we are unable to accept the revision because it was not filed within one year of the original submission.

**USAC recognizes that you may disagree with our decision. If you wish to file an appeal, your appeal must be received no later than 60 days after the date of this letter.**

In the event that you choose to appeal the decision, you should follow these guidelines:

- Write a "Letter of Appeal to USAC" explaining why you disagree with this Revised Form 499-A Rejection letter and identify the outcome that you request;
- Mail your letter to:  
Letter of Appeal  
USAC  
2120 L Street, NW, Suite 600  
Washington, DC 20037
- Appeals submitted by fax, telephone call, and e-mail **will not** be processed.
- Provide necessary contact information. Please list the name, address, telephone number, fax number, and e-mail address (if available) of the person who can most readily discuss this appeal with USAC.
- Identify the "Legal Reporting Name" and "Filer 499 ID."
- Explain the appeal to the USAC. Please provide documentation to support your appeal.

- Attach a photocopy of this Revised Form 499-A Rejection decision that you are appealing.

USAC will review all "letters of appeal" and respond in writing within 90 days of receipt thereof.

The response will indicate whether USAC:

- (1) agrees with your letter of appeal, and approves an outcome that is different from the Revised Form 499-A Rejection Letter; or
- (2) disagrees with your letter of appeal, and the reasons therefor.

If you disagree with the USAC response to your "letter of appeal," you may file an appeal with the FCC within 60 days of the date USAC issued its decision in response to your "Letter of Appeal." The FCC address where you may direct your appeal is:

Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Room TW-A325  
Washington, DC 20554

Please be sure to indicate the following information on all communications with the FCC:  
"Docket Nos. 96-45 and 97-21."

In the alternative, you may write and send an appeal letter directly to the Federal Communications Commission (FCC), and bypass USAC. Your letter of appeal to the FCC must explain why you disagree with the USAC decision. You are also encouraged to submit any documentation that supports your appeal. The FCC rules governing the appeals process (Part 54 of Title 47 of the Code of Federal Regulations 54.719 – 54.725) are available on the FCC web site ([www.fcc.gov](http://www.fcc.gov)).

If you have questions or concerns regarding this letter, please contact Lisa Tubbs at (973) 884-8116 or Lori Terraciano at (973) 560-4426.

Sincerely,

USAC

# 2000 FCC Form 499A Telecommunications Reporting Worksheet

Approval by OMB  
3060-0855

>>> Please read instructions before completing. <<<

Annual Filing - due April 1.

## Section 1: Corporation Identification Information

101 Filer 499 ID [If you don't know your number, contact the administrator at (973)-550-4400.  
If you are a new filer, leave blank and a Filer 499 ID will be assigned to you.]

812163

102 Legal name of reporting entity

Morris Communications, Inc.

103 IRS employer identification number

57-0420663

104 Name telecommunications service provider is doing business as

Morris Wireless

105 Principal communications business [Check the one that best describes the reporting entity - see directions. Check one box only.]

☐ CAP/CLEC

☐ Cellular/PCS/SMR (wireless telephony incl. by resale)

☐ Incumbent LEC

☐ Interexchange Carrier (IXC)

☐ Local Reseller

☐ Operator Service Provider (OSP)

☒ Paging & Messaging

☐ Payphone Service Provider

☐ Pre-paid Card

☐ Private Service Provider

☐ Satellite

☐ Shared Tenant Service Provider

☐ SMR (dispatch)

☐ Toll Reseller

☐ Wireless Data

If Other Local, Other Mobile or Other Toll is checked,

☐ Other Local

☐ Other Mobile

☐ Other Toll

describe carrier type / services provided:

106 Holding company O2F(All affiliated companies should show same name here)

107 FCC Registration Number (FRN) [not required for April 2000 filing]

0001-8848-57

108 Management company [if carrier is managed by another entity]

109 Complete mailing address of reporting entity  
corporate headquarters

Morris Communications, Inc.  
PO Box 18419  
Greenville, SC 29606

110 Complete business address for customer inquiries and complaints  
[if different from address entered on Line 109]

111 Telephone number for customer inquiries and complaints

( 800 ) - 884-8922

112 All trade names that you use in providing telecommunications services. This  
should include all names by which you are identified on customer bills.

a Morris Wireless

b Beep One

c Morris Communications, Inc.

d

e

f

Use an additional sheet if necessary. Each reporting entity must provide all names used for carrier activities.

PERSONS MAKING WILLFUL FALSE STATEMENTS IN THE WORKSHEET CAN BE PUNISHED BY FINE OR IMPRISONMENT UNDER TITLE 18 OF THE UNITED STATES CODE, 18 U.S.C. §1001

FCC Form 499-A  
February 2000

EXHIBIT TWO

**2000 FCC Form 499A Telecommunications Reporting Worksheet**

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<b>Block 2-A Personal Contact Information</b>	
201 Filer 499 ID [from Line 101]	B12163
202 Legal name of reporting entity [from Line 102]	Morris Communications, Inc.
203 Person who completed this worksheet	Todd Hicks
204 Telephone number of this person	( 864 ) - 234-7309
205 Fax number of this person	( 864 ) - 234-7514
206 E-mail of this person	thicks@morriswireless.com
207 Corporate office, attn. name, and mailing address to which future Telecommunications Reporting Worksheets should be sent	Morris Communications, Inc. Attn: Trace Morris PO Box 16419 Greenville, SC 29605
208 Billing address and billing contact person: [Plan administrators will send bills for contributions to this address. Please attach a written request for alternative billing arrangements.]	Morris Communications, Inc. Attn: Todd Hicks PO Box 16419 Greenville, SC 29605
<b>Block 2-B Agent for Service of Process</b>	
All carriers must complete Lines 209 through 213	
209 D.C. Agent for Service of Process per 47 U.S.C 413	Alston & Bird LLC Attn: Rick Joyce
210 Telephone number of D.C. agent	( 202 ) - 756-3300
211 Fax number of D.C. agent	( 202 ) - 756-3333
212 E-mail of D.C. agent	rjoyce@alston.com
213 Complete business address of D.C. agent for hand service of documents	Alston & Bird LLC Attn: Rick Joyce 601 Pennsylvania Ave. N.W. North Bldg. 11th Floor Washington, DC 20004-2601
214 Alternate Agent for Service of Process (optional)	
215 Telephone number of alternate agent	( ) -
216 Fax number of alternate agent	( ) -
217 E-mail of alternate agent	
218 Complete business address of alternate agent for hand service of documents	

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**2000 FCC Form 499A Telecommunications Reporting Worksheet**

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Block 2: Carrier's Carrier Revenue Information					
301	Filer 499 ID [from Line 101]	812163			
302	Legal name of reporting entity [from Line 102]	Morris Communications, Inc.			
Report Billed Revenue for January 1 through December 31, 1999 Do not report any negative numbers. Dollar amounts may be rounded to the nearest thousand dollars. However, report all amounts as whole dollars.		Total Revenue (a)	If breakouts are not book amounts, enter whole percentage estimates		Breakouts
See instructions regarding percent interstate & international.			interstate (b)	international (c)	Interstate Revenue (d)
Revenue from Service Provided for Resale by Other Contributors to Federal Universal Service Support Mechanisms					
<u>Fixed local service</u>					
303	Monthly service, local calling, connection charges, vertical features, and other local exchange service including subscriber line and PCCC charges to IXCs				
a	Provided as unbundled network elements				
b	Provided under other arrangements				
304	Per minute charges for originating or terminating calls				
a	Provided under state or federal access tariff				
b	Provided as unbundled network elements or other contract arrangement				
305	Local private line & special access				
306	Payphone compensation from toll carriers				
307	Other local telecommunications service revenues				
308	Universal service support revenue received from Federal or State Sources				
<u>Mobile service (including wireless telephony, paging &amp; messaging, and other mobile services)</u>					
309	Monthly, activation, and message charges except toll	459,130	12%		55,096
<u>Toll service</u>					
310	Operator and toll calls with alternative billing arrangements (credit card, collect, international call-back, etc.)				
311	Ordinary Long Distance (MTS, customer toll free 800/888 service, associated monthly account maintenance, PCCC pass-through, and switched services not reported above)				
312	Long distance private line services				
313	Satellite services				
314	All other long distance services				

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## 2000 FCC Form 499A Telecommunications Reporting Worksheet

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## Part C: Fixed Local and Non-Telecommunications Revenue Information

401	Filer 499 ID [from Line 101]				
402	Legal name of reporting entity [from Line 102]				
January 1 through December 31, 1999 Do not report any negative numbers. Dollar amounts may be rounded to the nearest thousand dollars. However, report all amounts as whole dollars. See instructions regarding percent interstate & international.		Total Revenue	If breakouts are not book amounts, enter whole percentage estimates		Breakouts
Revenue From All Other Sources (end-user telecom. & non-telecom.)		(a)	interstate (b)	international (c)	Interstate Revenue (d) International Revenue (e)
403	Surcharges or other amounts on bills identified as recovering State or Federal universal service contributions	115,438	12%		13,853
<u>Fixed local service</u>					
404	Monthly service, local calling, connection charges, vertical features, and other local exchange service charges except for federally tariffed subscriber line charges and PICC charges				
405	Tariffed subscriber line charges and PICC charges levied by a local exchange carrier on a no-PIC customer				
406	Local private line and special access service				
407	Payphone coin revenues				
408	Other local telecommunications service revenues				
<u>Mobile service (including wireless telephony, paging &amp; messaging, and other mobile services)</u>					
409	Monthly and activation charges	8,353,004	12%		1,002,360
410	Message charges including roaming but excluding toll charges				
<u>Toll service</u>					
411	Pre-paid calling card (including card sales to customers and non-carrier distributors) reported at face value of cards				
412	International calls that both originate and terminate in foreign points		0%	100%	
413	Operator and toll calls with alternative billing arrangements (credit card, collect, international call-back, etc.) other than revenue reported on Line 412				
414	Ordinary Long Distance (MTS, customer toll free 800/888 service, associated monthly account maintenance, PICC pass-through, and other switched services not reported above)				
415	Long distance private line services				
416	Satellite services				
417	All other long distance services				
418	Enhanced services; inside wiring maintenance, billing and collection, customer premises equipment, published directory, dark fiber, Internet and non-telecommunications service revenue	4,085,658			
419	Gross billed revenue from all sources (incl. reseller & non-telecom.) [Lines 303 through 314 plus Lines 403 through 418]	13,013,230			1,071,309
420	Universal service contribution bases [Lines 403 through 411 & Lines 413 through 417]	8,468,442			1,016,213

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<b>Block 2 Additional Revenue Breakouts</b>	
501 Filer 499 ID [from Line 101]	812183
502 Legal name of reporting entity [from Line 102]	Morris Communications, Inc.

Most filers must contribute to LNP administration and must provide the percentages requested in Lines 503 through 510. Filing entities that use Line 603 to certify that they are exempt from this requirement need not provide this information.

Percentage of revenue reported in Block 3 and Block 4 billed in each region of the country. Round or estimate to nearest whole percentage. Enter 0 if no service was provided in the region.

			Block 3 Carrier's Carrier (a)	Block 4 End-User Telecom. (b)
503	Southeast:	Alabama, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, Puerto Rico, South Carolina, Tennessee and U.S. Virgin Islands	100%	100%
504	Western:	Alaska, Arizona, Colorado, Idaho, Iowa, Minnesota, Montana, Nebraska, New Mexico, North Dakota, Oregon, South Dakota, Utah, Washington, Wyoming	%	%
505	West Coast:	California, Hawaii, Nevada, American Samoa, Guam, Northern Mariana Islands, and Wake Island.	%	%
506	Mid-Atlantic:	Delaware, District of Columbia, Maryland, New Jersey, Pennsylvania, Virginia, West Virginia	%	%
507	Mid-West:	Illinois, Indiana, Michigan, Ohio, Wisconsin	%	%
508	Northeast:	Connecticut, Maine, Massachusetts, New Hampshire, New York, Rhode Island, Vermont	%	%
509	Southwest:	Arkansas, Kansas, Missouri, Oklahoma, & Texas	%	%
510	Total	[Percentages must add to 0 or 100]	100%	100%

511 Revenues from resellers that do not contribute to Universal Service support mechanisms are included in Block 4, Line 420 but may be excluded from a filer's TRS, NANPA and LNP contribution bases. To have these amounts excluded, the filer has the option of identifying such revenues below.

	(a)	(b)
	Total Revenue	Interstate and International
Revenues from resellers that do not contribute to Universal Service	\$	\$

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## 2000 FCC Form 499A Telecommunications Reporting Worksheet

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## PART 2 CERTIFICATION by an officer of the filer

601 Filer 499 ID [from Line 101]

812163

602 Legal name of reporting entity [from Line 102]

Morris Communications, Inc.

Section IV of the instructions provides information on which types of reporting entities are required to file for which purposes. Any entity claiming to be exempt from one or more contribution requirements should so certify below and attach an explanation. [The Universal Service administrator will determine which entities meet the de minimis threshold based on information provided in Block 4, even if you fail to so certify, below.]

603 I certify that the reporting entity is exempt from contributing to:

Universal Service

☐

TRS

☐

NANPA

☐

LNP Administration

☐

Provide explanation below:

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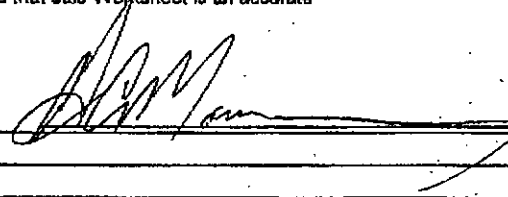
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604 I certify that the revenue data contained herein is privileged and confidential and that public disclosure of such information would likely cause substantial harm to the competitive position of the company. I request nondisclosure of the revenue information contained herein pursuant to Sections 0.459, 52.17, 54.711 and 64.604 of the Commission's Rules.

☒

I certify that I am an officer of the above-named reporting entity, that I have examined the foregoing report and to the best of my knowledge, information and belief, all statements of fact contained in this Worksheet are true and that said Worksheet is an accurate statement of the affairs of the above-named company for the previous calendar year.

605 Signature



606 Printed name of officer

H. A. Morris III

607 Position with reporting entity

President/CEO

608 Date

3/22/02

609 This filing is:

☐ Original filing☒ Revised filing

Do not mail checks with this form. Send this form to: Form 499 c/o NECA, 80 South Jefferson Road, Whippany New Jersey, 07981

For additional information regarding this worksheet contact: Telecommunications Reporting Worksheet Information: (973) 560-4400 or via e-mail: Form499@neca.org

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February 2000